

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
)
v.) CR. NO. 04-10390-WGY
)
MICHAEL AMBERS)

**GOVERNMENT'S RESPONSE TO DEFENDANT'S
MOTION TO CONTINUE TRIAL**

Although the United States assents to defendant Michael Ambers' Motion To Continue the trial now scheduled for February 27, 2006, the government suggests that rather than reschedule the trial now for April 10, 2006, (and perhaps have to continue it again), the Court hold a status conference immediately after the undersigned Assistant U.S. Attorney finishes his current trial and set a firm trial date then. In support of its response the government further says the following.

1. The undersigned AUSA is now engaged in the trial of United States v. Paul A. Decologero, et. al, Cr. No. 01-10373-RWZ, which began on January 9, 2006, and is expected to continue well into March, 2006 (and perhaps deep into March).

2. The undersigned AUSA has a long-planned family vacation now scheduled for the period from March 20, 2006 through March 28, 2006. (The vacation may be negated by the ongoing trial.) The undersigned AUSA also has a long-planned reunion with his college roommates, which is scheduled for April 13-16, 2006.

3. Because of the uncertainty concerning precisely when the Decologero trial will end and the undersigned AUSA's schedule, the government requests that the Court schedule a status conference shortly after the completion of the Decologero trial to set a firm trial date. (The government will notify the clerk immediately upon completion of that trial).

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/CHRISTOPHER F. BATOR
Assistant U.S. Attorney

Date: February 22, 2006

CERTIFICATE OF SERVICE

I, CHRISTOPHER F. BATOR, certify that I have served a copy of the above upon Frank D. Camera, Esq. by electronic filing.

/s/CHRISTOPHER F. BATOR
Assistant U.S. Attorney

Date: February 22, 2006